

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MEGAN PETE, an individual

Civil Action No. 1:24-cv-24228

Plaintiff,

v.

MILAGRO ELIZABETH COOPER,
an individual,

JURY TRIAL DEMANDED

Defendant.

NOTICE OF ISSUES TO BE DISCUSSED AT DISCOVERY HEARING
(ZOOM)

PLEASE TAKE NOTICE that a hearing on discovery matters will be held before Magistrate Judge Lisette M. Reid on June 4, 2025 at 9:30 a.m. via Zoom. The discovery matters to be heard include:

1. The possession and handling of Attorneys' Eyes Only information while Defendant is without counsel, including Plaintiff's furnishing of such information to experts. *See* ECF No. 40 at ¶ 2.3.
2. Rescheduling Defendant's June 4, 2025 deposition to one of the following dates: June 25, 26, 27, 30, or July 1, which shall proceed whether or not she has counsel by then.
3. In light of the postponement of Defendant's deposition, extending the following deadlines (*see* ECF No. 62 at 1):
 - a. Exchange of expert reports: from June 27, 2025 to July 18, 2025
 - b. Exchange of reply expert reports: from July 11, 2025 to July 25, 2025.

- c. Completion of discovery: from July 25, 2025 to August 1, 2025.
- 4. Requiring Defendant to meet and confer on discovery issues.
- 5. Enforcement of Defendant's obligation as a pro se party to follow the Southern District of Florida's Local Rules, which incorporate (via L.R. 11.1(c)) the Rules Regulating the Florida bar. Rule Regulating the Florida Bar 4-8.4(d) prohibits conduct prejudicial to the administration of justice. Specifically, it prohibits communications about a case or the parties that could prejudice the jury pool. Defendant's statements in her public blog about the case and Plaintiff cross that line.

Copies of the relevant source documents will be emailed to Chambers consistent with the procedures set forth in Magistrate Judge Reid's Discovery Procedures Order.

Plaintiff no longer seeks the Court's assistance as to the production of documents and information from Defendant's cell phone. FTI has completed its review and, in accordance with the parties' FTI Protocol, provided the parties with a link to the contents that FTI is to produce to Plaintiff.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)

Undersigned counsel conferred with Ms. Cooper via email multiple times to request this status conference, which the Court granted.

Dated: June 3, 2025

Respectfully submitted,

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

/s/ Daniel L. Humphrey

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Attorneys for Plaintiff Megan Pete

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on Defendant Cooper via email and a copy will be mailed to her, return receipt requested.

By: /s/ Daniel L. Humphrey
Daniel L. Humphrey
Fla. Bar No. 1024695